BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of Compliance Filings by Kansas City Power & Light Company, Westar Energy, Inc., Kansas Gas and Electric Company and Evergy, Inc. Regarding Service Quality and Reliability Performance Standards Pursuant to the Commissions Order in Docket No. 18-KCPE-095-MER.	)	Docket No. 19-KCPE-178-CPL

COMPLIANCE FILING

COME NOW Evergy Metro, Inc. d/b/a Evergy Kansas Metro [f/k/a Kansas City Power & Light Company]("Evergy Kansas Metro"), Evergy Kansas Central, Inc. [f/k/a Westar Energy, Inc.] and Evergy Kansas South, Inc. [f/k/a Kansas Gas and Electric Company] (collectively referred to herein as "Evergy Kansas Central");" and all three collectively referred to herein as "Companies")[1], and submit this compliance filing ("Compliance Filing"), as required by the Order of the State Corporation Commission of the State of Kansas ("Commission") issued in Docket No. 18-KCPE-095-MER ("18-095 Docket") on May 24, 2018 ("Merger Order"). In its Merger Order the Commission approved the Non-Unanimous Settlement Agreement submitted on March 7, 2018, by certain parties to the 18-095 Docket ("Settlement Agreement"). Attachment A to the Settlement Agreement contains Merger Conditions, some of which require the Companies to make post-merger filings with the Commission. Certain of these filings will be submitted in this docket established for that purpose.

1. Merger Condition 36 provides as follows:

> **Service Quality and Reliability Performance Standards:** KCP&L and Westar will report the particular performance metrics as set forth in

[1] Effective October 8, 2019, Evergy Metro, Inc. d/b/a Evergy Kansas Metro adopted the service territory and tariffs of KCP&L; *Order Approving Name Change*, Docket No. 20-KCPE-122-CCN, dated October 8, 2019. Effective October 8, 2019, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. d/b/a collectively as Evergy Kansas Central adopted the service territory and tariffs of Westar; *Order Approving Name Change*, Docket No. 20-WSEE-123-CCN, dated October 8, 2019.

Exhibits BA-4 and BA-5 of the direct testimony of Bruce Akin. Exhibits BA-1 through BA-5 are provided in Attachment 4 to the Settlement Agreement. **KCP&L and Westar will also provide the reports described in Attachment 5 to the Settlement Agreement.** Changes to future reporting can be made, as mutually agreed upon by Applicants, Staff and CURB.

2. In accordance with the **bolded** portion of Merger Condition 36 relating to Attachment 5 to the Settlement Agreement,[2] the Companies hereby submit to the Commission the information required in the attached **Exhibit 1**:

Respectfully submitted,

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COUNSEL FOR EVERGY KANSAS METRO and EVERGY KANSAS CENTRAL F/K/A KANSAS CITY POWER & LIGHT COMPANY, WESTAR ENERGY, INC., AND KANSAS GAS & ELECTRIC COMPANY

[2] Although the Companies are required to, "[…]provide Staff with the annual normalized year-end SAIDI, SAIFI, and CAIDI results for both Evergy Kansas Metro and Evergy Kansas Central within 90 days of the end of the calendar year[…]" (see *Settlement Agreement*, Attachment 5)—which would have made this Compliance Filing due on March 31, 2020—pursuant to the March 19, 2020 *Emergency Order Staying All Dockets* issued in Docket No. 20-GIMX-393-MIS, the Companies were unable to file until the Commission resumed operations and acceptance of filings today, April 6, 2020.

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Darrin R. Ives, upon oath first duly sworn, states that he is the Vice President of Regulatory Affairs of Evergy, Inc., that he has reviewed the foregoing pleading, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

Darrin R. Ives
Vice President, Regulatory Affairs

Subscribed and sworn to before me this 6th day of April 2020.

Notary Public

My appointment expires: 4/26/2021

ANTHONY R WESTENKIRCHNER
Notary Public, Notary Seal
State of Missouri
Platte County
Commission # 17279952
My Commission Expires April 26, 2021

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 6th day of April 2020 to:

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Kansas Corporation Commission
Docket 19-KCPE-178-CPL
Evergy Kansas Metro and Evergy Kansas Central
Commitment 36 – Attachment 5 – Additional Reporting
Annual Report

Background

In Docket No. 18-KCPE-095-MER, *In the Matter of the Application of Great Plains Energy Incorporated, Kansas City Power & Light Company and Westar Energy, Inc. for Approval of the Merger of Evergy Kansas Central, Inc. and Great Plains Energy Incorporated,* the Kansas Corporation Commission ("Commission") issued its Order Approving Merger Application ("Order") on May 24, 2018. The Order approved the Non-Unanimous Settlement Agreement ("Agreement") filed on March 7, 2018. The Agreement included a commitment made by Evergy Kansas Metro and Evergy Kansas Central ("Company") to file additional reporting regarding Reliability and Vegetation Management, specifically Commitment 36, Service Quality and Reliability Performance Standards.

Commitment No. 36:

Service Quality and Reliability Performance Standards: If Evergy Kansas Metro or Evergy Kansas Central fail to meet a particular performance metric threshold set forth in Exhibits BA-I, BA-2, BA-3 of the direct testimony of Bruce Akin, then penalties would be used to pay for system upgrades to improve reliability and will not be recovered in cost of service. If Evergy Kansas Metro or Evergy Kansas Central perform without penalties on any metric for three consecutive calendar years, then the reporting and penalty provisions for that metric for that utility will terminate. Evergy Kansas Metro and Evergy Kansas Central will report the particular performance metrics as set forth in Exhibits BA-4 and BA-5 of the direct testimony of Bruce Akin. Exhibits BA-1 through BA-5 are provided in Attachment 4 to the Settlement Agreement. Evergy Kansas Metro and Evergy Kansas Central will also provide the reports described in Attachment 5 to the Settlement Agreement. Changes to future reporting can be made, as mutually agreed upon by Applicants, Staff and CURB.

Attachment 5: Applicants Additional Quality of Service Commitments

A. Applicants will provide Staff with the annual normalized year-end SAIDI, SAIFI, and CAIDI results for both Evergy Kansas Metro and Evergy Kansas Central within 90 days of the end of the calendar year and will compare those results to the 5-year annual normalized average (2012-2016) for each individual metric. If the actual results of any individual metric vary substantially from the 5-year average, then Applicants will provide a high-level summary of the reasons why such degradation occurred.

B. Present IT system consolidation updates to Staff annually during the moratorium period related to:
   - Outage Management System (OMS)
   - Geographic Information System (GIS)
   - Energy Management System (EMS)
   - Enterprise Asset Management (EAM)

C. Reliability Reporting Criteria:(Additional reporting during the moratorium period)

C1) Provide vegetation management reporting including:

a. Miles/acres cleared
b. Cycles and off cycle clearing
c. Outages related to vegetation
d. Actual dollars spent versus budgeted dollars
e. Dollars per mile/acre cleared

C2) Provide post storm review of significant outages causes on each Major Event Day:

- Using "Major Event Day" as defined within IEEE1366
- Develop lessons learned

C3) Provide summary results of transmission system patrols

A. Annual Normalized year-end SAIDI, SAIFI and CAIDI and 5-year Average 2012-2016

2019 Quality of Service Reliability Statistics

Evergy Kansas Metro
Reliability Data
2019

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
IEEE 1366 Nomalized SAIDI	5.25	1.98	5.45	5.71	10.80	5.47	4.34	11.31	5.16	3.00	2.45	2.08	63.00
IEEE 1366 Nomalized SAIFI	0.050	0.025	0.075	0.064	0.081	0.054	0.054	0.098	0.061	0.052	0.033	0.029	0.676
IEEE 1366 Nomalized CAIDI	106.05	79.47	72.45	89.24	132.78	101.09	80.89	115.48	84.58	57.38	73.19	71.69	93.52

Evergy Kansas Central
Reliability Data
2019

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
IEEE 1366 Nomalized SAIDI	6.60	4.78	7.20	7.45	17.52	8.43	10.86	19.06	6.03	9.20	7.90	5.67	110.70
IEEE 1366 Nomalized SAIFI	0.057	0.052	0.072	0.082	0.139	0.098	0.103	0.148	0.065	0.090	0.084	0.074	1.064
IEEE 1366 Nomalized CAIDI	115.64	91.14	100.03	91.06	125.96	86.33	105.43	128.61	92.59	102.34	94.08	76.91	104.03

NOTES:
1. Metrics are normalized using IEEE 1366 including partial power outages.
2. Metrics represent transmission and distribution reliability for Kansas customers only.
3. SAIDI and SAIFI metrics were calculated by using the customer count for each month and then summing the individual months metrics for the annual metric.

2012-2016 Quality of Service Reliability Statistics

Evergy Kansas Metro

	2012	2013	2014	2015	2016	Average
IEEE 1366 Nomalized SAIDI	61.6	65.2	74.3	108.9	84.2	78.8
IEEE 1366 Nomalized SAIFI	0.60	0.65	0.78	0.95	0.85	0.77
IEEE 1366 Nomalized CAIDI	102.7	100.3	95.3	114.6	99.1	102.4

Evergy Kansas Central

2012	2013	2014	2015	2016	Average
111.3	118.4	118.3	124.2	133.7	121.2
1.24	1.27	1.34	1.37	1.28	1.30
90.0	93.5	88.2	90.4	104.1	93.2

NOTES:
1. Metrics were normalized using IEEE 1366 excluding partial power outages.
2. Metrics represent transmission and distribution reliability for Kansas customers only.
3. SAIDI and SAIFI metrics were calculated by using a single customer count effective December of each year.

B. IT System Consolidation

The Company will work with Staff to schedule a meeting to fulfill this commitment.

C(1). Vegetation Management Reporting

a) Annual Tree Trimming Expenditures

Distribution System:

Vegetation Management Budget vs Actual Distribution System Evergy Kansas				
Year	Budget		Actual	
	Central	Metro	Central	Metro
2019	$23,500,000	$4,062,763	$23,529,949	$4,269,694

Costs include contracted program management, scheduled and non-scheduled line clearance work in the company's Kansas service territory.

Transmission System:

Vegetation Management Budget vs Actual Transmission System Evergy Kansas				
Year	Budget		Actual	
	Central	Metro	Central	Metro
2019	$1,675,000	$806,435	$1,464,321	$1,408,163

Costs include contracted program management, scheduled and non-scheduled line clearance work in the company's Kansas service territory.

b) Annual Expenditures: Scheduled and Non-Scheduled

Distribution System:

Vegetation Management Scheduled vs Non-Scheduled Expenditures Distribution System Evergy Kansas				
Year	Scheduled		Non-Scheduled	
	Central	Metro	Central	Metro
2019	$19,746,286	$3,632,043	$3,783,663	$637,651

Costs include contracted program management, labor and equipment.

Transmission System:

Vegetation Management Scheduled vs Non-Scheduled Expenditures Transmission System Evergy Kansas				
Year	Scheduled		Non-Scheduled	
	Central	Metro	Central	Metro
2019	$1,317,889	$985,714	$146,432	$422,449

Costs include contracted program management, labor and equipment.

c) Annual Miles Trimmed and/or Cleared

Annual Mileage Trimmed/Cleared Transmission and Distribution Systems Evergy Kansas				
Year	Transmission		Distribution	
	Central	Metro	Central	Metro
2019	1154	85	4176	845

d) Annual Cost per Mile

Annual Dollars per Mile Expenditures Transmission and Distribution Systems - KS				
Year	Transmission		Distribution	
	Central	Metro	Central	Metro
2019	$1,142	$11,572	$4,729	$4,298

e) Outages Related to Vegetation: 2018 Un-Normalized

Tree Caused Outages by Service Center Totals Distribution System – KS			
2019 Evergy KS Central: Tree-Caused Outages by Service Center		2019 Evergy KS Metro: Tree-Caused Outages by Service Center	
Service Center	Outages	Service Center	Outages
Abilene	13	Johnson County	1670
Arkansas City	44	Ottawa/Paola	196
Atchison	68	Southland	122
El Dorado	47		
Emporia	173		
Ft. Scott	39		
Humboldt	34		

2019 Evergy Kansas Central: Tree-Caused Outages by Service Center		2019 Evergy Kansas Metro: Tree-Caused Outages by Service Center	
Service Center	**Outages**	**Service Center**	**Outages**
Hutchinson	70		
Independence	62		
Junction City	27		
Lawrence	218		
Leavenworth	173		
Manhattan	119		
Marysville	67		
Newton	52		
Parsons	64		
Pittsburg	83		
Salina	119		
Shawnee	147		
Topeka	338		
Wichita	614		
Grand Total	**2571**	**Grand Total**	**1988**

Chart 1 and Chart 2 provide tree caused outage totals by company and by facility type impacted in the Evergy Kansas Central and Evergy Kansas Metro service territories.

Chart 1 Evergy Kansas Central Tree Caused Events: Facility Type

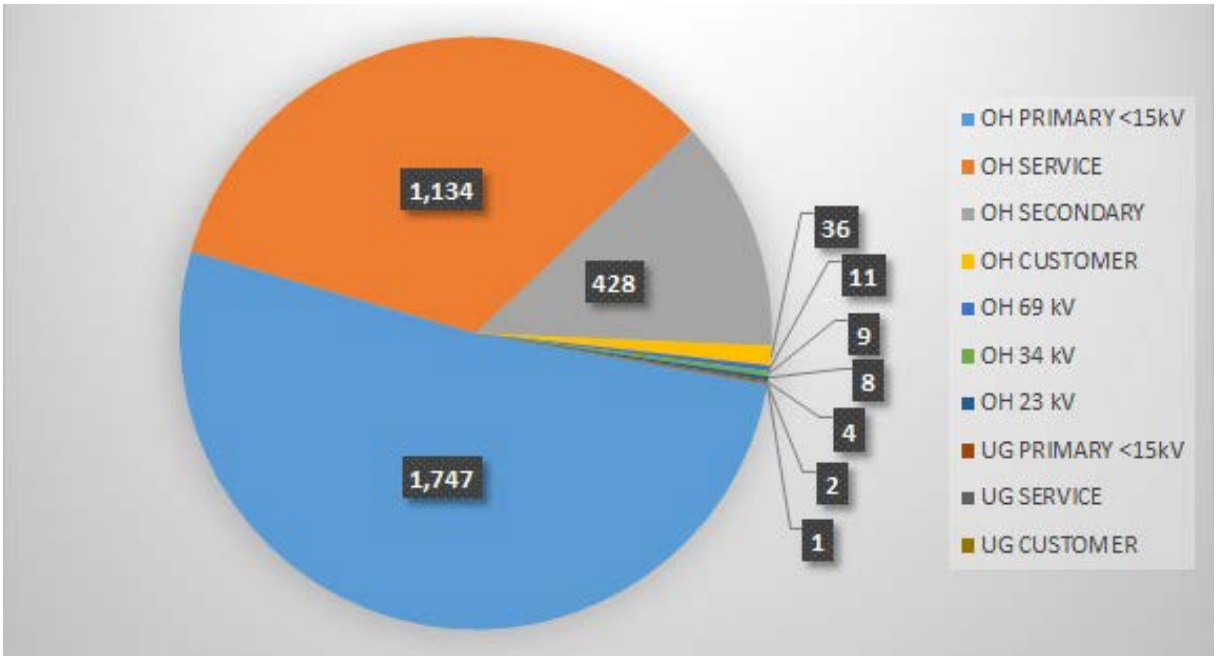
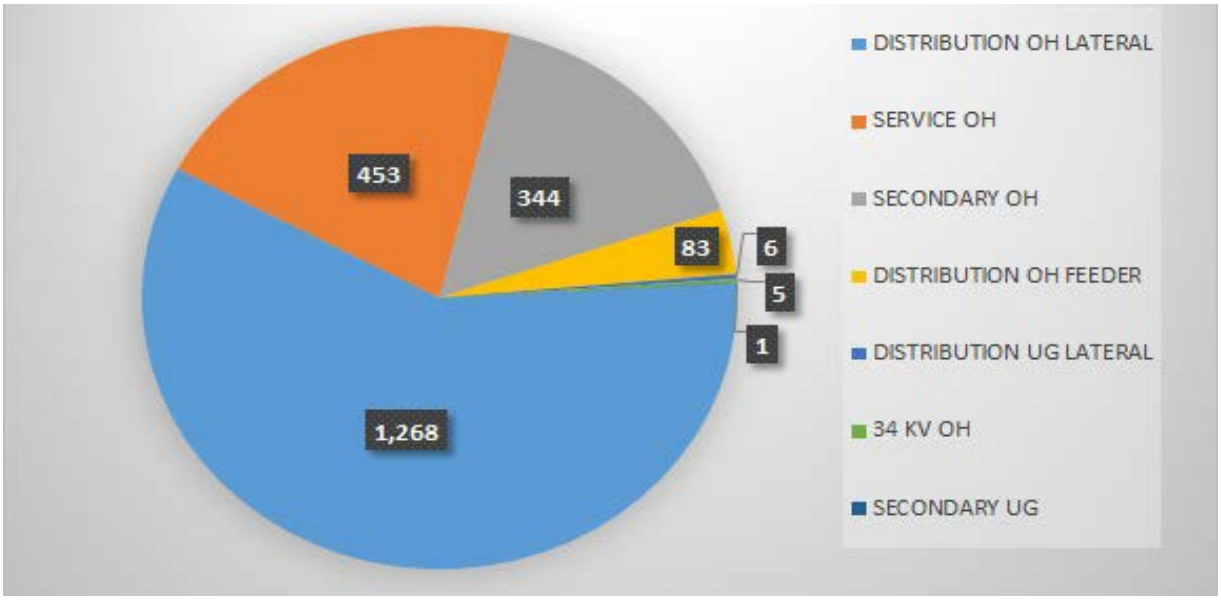


Chart 2 Evergy Kansas Metro Tree Caused Events: Facility Type



C(2). Post Storm Review of Significant Outages Caused of Each Major Event Day

Evergy had their first major storm as one company on January 11, 2019. Lessons learned from that storm:

1. We have put all company linemen through the onboarding process (clearance procedure training). By doing this, we are now able to spend less time on the front end of a storm providing required training. This gives us the ability to get crews out in the field sooner whereby restoring power.

2. Vegetation has a dispatch desk in the DSO during large storms. This has minimized stand by time due to needing tree crews.

3. For future storms, we will be bringing in dispatchers a few hours before line crews are scheduled to start work as this gives them the ability to group tickets and have them ready when crews start calling for their first shot.

4. To get communication out to all linemen, we utilized the AROCS callout to relay pertinent information to employees (i.e. time to show up to work, expect phone calls, etc). This proved to be very positive and it is our intent to continue this process for future storms.

5. Safety onboarding for other utilities/contractors, Evergy now has a video available whereby outside resources can view it prior to arriving on our property to start work.
6. Evergy ran the damage assessment team out of a location separate from the emergency operation center. Safety briefings were conducted each morning prior to employees heading to the field.

7. Our Wire Down team is ran out of our Meter Tech group during a storm. In future storms it is our plan to integrate Metermen from the Evergy Kansas Central property into the wire down process for Evergy.

8. As it relates to Materials at service centers. If there is a service center that is not impacted by the storm, we will move Materials resources to the service centers that need additional assistance with issuing and delivering materials.

9. We utilized drone footage during the January 11, 2019 storm. This was very beneficial in helping us tell our Evergy storm story.

10. We were also able utilize dispatchers from Evergy Kansas Central to assist with Evergy Metro dispatching. This proved to be very beneficial in closing out tickets, and it is our plan to continue this practice for future storms.

Evergy continues to target older infrastructure and will repair or replace it where prudent.

Evergy is committed to the safety of our employees as well as the safety of our customers. We continue to maintain a list of all critical customers (hospitals, nursing homes, schools, critical care customers, and critical infrastructures). These customers will continue to be given special consideration.

Evergy has continued with the Automatic Meter Infrastructure (AMI) roll out. With the use of AMI meters we are able to reduce the number of truck rolls at the end of a storm.

- Automation Projects – MO West and Metro
- Reclosers
- TripSavers
- Capacitor Banks
- Communication Fault Current Indicators (CFCI)
- Automation Projects – KS Central
- Reclosers
- TripSavers
- Capacitor Banks
- Voltage Regulators
- Communication Fault Current Indicators (CFCI)

Major Event Day Summary

Specific details related to each major storm date recorded by either Evergy Kansas Metro or Evergy Kansas Central service territory are listed below.

January 11, 2019
Evergy Kansas Metro was impacted with a snow storm overnight. Outage numbers continued to grow through the night and into the following afternoon. The executive team started coordinating restoration efforts early Saturday morning, employing resources from both companies, neighboring utilities and the EEI mutual assistance group to assist with restoration efforts. This storm evolved into a Class 4 that impacted approximately 186,000 customers.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	185,744	275,561,273	311.7

January 18, 2019
Evergy Kansas Central was hit with an ice storm which brought in snow, ice and then strong wind gusts of 40mph – 55 mph. The bulk of the outages were in and around the Manhattan, Wichita and Leavenworth areas.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Central	27,869	5,532,031	7.78

May 20, 2019
Various areas of our service territory (Evergy Kansas Central and Evergy Kansas Metro) were impacted by thunderstorms which dumped heavy rain, lightning and significant winds overnight.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	15,144	3,380,472	3.72
Evergy Kansas Central	19,513	2,790,191	3.94

May 24, 2019
Evergy Kansas Metro was impacted by thunderstorms with the bulk of the outages being on the Kansas side of Evergy Kansas Metro.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	25,002	3,452,683	3.80

May 27, 2019
Evergy Kansas Central experienced severe thunderstorms and tornadoes in the service territory. The bulk of the outages were in the areas surrounding Lawrence.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Central	38,064	14,498,531	20.45

June 15, 2019
Evergy Kansas Central experienced outages due to a severe storm that went through the various areas of the service territory. These storms were bringing over 70 mph winds.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Central	9,534	3,071,376	4.33

June 21, 2019
This storm impacted both companies. We experienced two rounds of storms. We had significant winds approaching 60 mph and contained a large amount of lightning.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	44,496	9,041,993	10.01
Evergy Kansas Central	54,236	12,122,333	17.09

June 22, 2019
This storm came right on the heels of completing restoration efforts from the June 21, 2019 storm. This was a Evergy Kansas Metro storm that produced a significant amount of lightning and a few pockets of damaging winds.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	25,555	5,697,828	6.31

July 10, 2019
This storm rolled through Kansas City producing rain and strong winds, and affected mainly our Kansas City metro area.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	47,271	10,995,488	12.10

July 21, 2019
This was a thunderstorm effecting mainly the Kansas City Metro, St. Joseph and East District.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	47,271	10,995,488	12.10

August 16, 2019
Both companies experienced storms with heavy rains, hail and strong winds.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	53,547	8,692,290	9.57
Evergy Kansas Central	14,044	4,122,163	5.80

August 30, 2019
Strong winds and thunderstorms were experienced in the Evergy Kansas Central service territory.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Central	21,989	6,251,791	8.80

September 27, 2019
Evergy Kansas Metro experienced a severe hail storm.

	CUSTOMERS	CMI	CAIDI
Evergy Kansas Metro	19,834	3,305,136	3.64

C(3). Transmission System Patrols Summary

All Evergy Kansas Central and Evergy Kansas Metro transmission lines are patrolled annually by aerial and/or ground patrol. Evergy Kansas Central has 50,813 structures and Evergy Kansas Metro has 4,147 structures. There were 128 combined corrective actions, based on aerial and ground patrols, completed in 2019. There are 66 combined corrective actions scheduled for 2020 completion.

Detailed and intrusive inspections were completed on transmission lines in both Evergy Kansas Central and Evergy Kansas Metro service areas in 2019. Evergy Kansas Central had 7,256 poles and Evergy Kansas Metro had 1,034 poles for a total of 8,290 poles that were inspected in the combined service areas of which, 0 were found in need of corrective action. There were 32 combined corrective actions, based on detailed and intrusive inspections, completed in 2019. There are 20 poles scheduled for completion in 2020.

Patrol means a simple visual inspection, of applicable electrical corporation equipment and structures, which is designed to identify obvious structural problems and hazards. Patrols may be carried out in the course of another electrical corporation business.

Visual inspection of circuits and circuit sections are completed using a checklist and/or documented procedure to perform a condition assessment of the structure, and structural supporting components, insulators, attached conductors and equipment. The condition assessment checklist and/or procedure shall target hazards that will affect public or employee safety and system reliability.

Detailed inspection means an inspection where individual pieces of equipment and structures are carefully examined, visually and through use of routine diagnostic testing, as appropriate, and (if practicable and if useful information can be so gathered) opened, and the condition of each rated and recorded; Intrusive inspection means an inspection involving movement of soil, taking samples for analysis, and/or using more sophisticated diagnostic tools beyond visual inspections or instrument reading.

Evergy Kansas Central Transmission				Completed Through December 2019			
System Class	**Inspection Type**	**Facility Type**	**Units**	**Inspections Planned for 2019**	**Inspections Completed During 2019**	**Inspections Completed Prior to 2019 (Ahead of Plan)**	**Inspections Pending in 2019 Outside of Plan**
Transmission	Aerial and Ground Patrol	Overhead Circuits Structures & Equipment	Structures	49,382	50,813	0	0
		Underground Structures and Equipment	Structures	2	6	0	0
	Detail and Intrusive	Wood/Steel Poles	Poles	7,168	7,256	0	0

Evergy Kansas Metro Transmission				Completed Through December 2019			
System Class	**Inspection Type**	**Facility Type**	**Units**	**Inspections Planned for 2019**	**Inspections Completed During 2019**	**Inspections Completed Prior to 2019 (Ahead of Plan)**	**Inspections Pending in 2019 Outside of Plan**
Transmission	Aerial and Ground Patrol	Overhead Circuits Structures & Equipment	Structures	4,141	4,147	0	0
		Underground Structures and Equipment	Structures	n/a	n/a	n/a	n/a
	Detail and Intrusive	Wood/Steel Poles	Poles	1,009	1,034	0	0

Evergy Kansas Central Transmission Corrective Action (CA) Summary							
System Class	**Inspection Type**	**Facility Type**	**Component**	**CA Planned in 2019**	**CA Completed in 2019**	**CA Planned in 2020**	**CA Planned after 2020**
Transmission	Aerial and Ground Patrol	Overhead Structures & Equipment	Poles, Switches	40	119	61	50
	Aerial and Ground Patrol	Underground Structures and Equipment	Manhole	0	0	0	0
	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	6	26	20	30

Evergy Kansas Metro Transmission Corrective Action (CA) Summary							
System Class	**Inspection Type**	**Facility Type**	**Component**	**CA Planned in 2019**	**CA Completed in 2019**	**CA Planned in 2020**	**CA Planned after 2020**
Transmission	Aerial and Ground Patrol	Overhead Structures & Equipment	Poles, Switches	6	9	5	5
	Aerial and Ground Patrol	Underground Structures and Equipment	Manhole	n/a	n/a	n/a	n/a
	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	1	6	0	0